

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Jamie Lynn RICHARDS

Case No.

2:25-mj-180

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 21, 2022 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

18 U.S.C. § 922(a)(6)

Offense Description

Knowing making of false statement in connection with purchase of firearm

This criminal complaint is based on these facts:

See the attached Affidavit, which is fully incorporated herein.

☒ Continued on the attached sheet.

Amanda K. Hill

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Complainant's signature

Amanda K. Hill, ATF Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

VIA FACETIME

Date: March 28, 2025

City and state: Columbus, Ohio

Elizabeth Preston Deyers

Judge's signature

Elizabeth Preston Deyers, U.S. Magistrate Judge

Printed name and title



PROBABLE CAUSE AFFIDAVIT
Shawn Lavell MIDDLETON Jr.

I, Amanda K. Hill, being duly sworn, depose and state that:

1. I have been a Police Officer with the Columbus, Ohio Division of Police since 2011. I have been a Task Force Officer (TFO) with the United States Department of Justice, Bureau of Alcohol, Tobacco Firearms, and Explosives (ATF) since July 2021. As a result of my training and experience, I am familiar with State and Federal criminal laws pertaining to firearms and narcotics violations.
2. This affidavit is being submitted in support of an application for a criminal complaint against Jamie Lynn RICHARDS, hereafter referred to as RICHARDS, did knowingly make false statements in connection with the purchase of firearms in or affecting interstate commerce, and foreign commerce, in violation of 18 U.S.C. § 922(a)(6) and 924(a).
3. The facts set forth within this affidavit come from the Affiant's own personal involvement with the investigation, as well as information provided by other law enforcement officers and reports. The information outlined below does not contain all details or facts of which I am aware relating to this investigation, but rather as provided for the limited purpose of establishing probable cause that RICHARDS committed this offense.
4. On August 21, 2022, at approximately 1:52PM, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Firearms Trace Summary T20220447353, indicated Jamie Lynn RICHARDS purchased a Taurus International, model G2C, 9-millimeter semi-automatic pistol, bearing serial number: 1C151051. This purchase was made from Vance Outdoors, located at 4250 Alum Creek Drive Obetz, Ohio 43207. This trace indicated a very short "Time to Crime" period of 17 days elapsed from date of purchase to date of recovery.
5. On August 21, 2022, at approximately 4:09PM, ATF Firearms Trace Summary T20220447379, indicated RICHARDS purchased a Taurus, model G2C, 9-millimeter semi-automatic pistol, bearing serial number: ADB929685. This purchase was made from Vance Outdoors, located at 3723 Cleveland Avenue Columbus, Ohio 43224. This trace indicated a very short "Time to Crime" period of 17 days elapsed from date of purchase to date of recovery.
6. On September 7, 2022, Columbus Police Department (CPD) officers were flagged down by citizens regarding a tan Toyota, whose occupants were shooting items at them with a sling shot. CPD officers located a vehicle matching the description, bearing Ohio license plate JSK1534 and initiated a traffic stop. Officers noted that this vehicle was registered to a N.T. The vehicle fled from the traffic stop and then crashed into several other vehicles. Upon crashing, two occupants, later identified as W.C. and N.T., fled the vehicle on foot. The officer who initially made the traffic stop could see the vehicle occupants exit the vehicle, and observed one occupant, later identified as W.C., crouch behind one of the struck vehicles before continuing flight. Officers would later recover a plastic baggie of a white rock-like substance from this same area. Both W.C. and N.T. were later apprehended by CPD. W.C. and N.T. were juveniles at the time of the arrest.

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Shawn Lavell MIDDLETON Jr.

7. In the vehicle, officers located two additional occupants, K.H. and G.Z., who would provide statements to CPD officers.
8. K.H. stated that her boyfriend, N.T., was driving. Additionally, on that day, he had picked up "William" to go sell drugs; specifically, "Hard". K.H. did confirm that N.T. had a firearm on his person that day, that he told her was his aunt's firearm. K.H. also confirmed to officers that W.C. had a firearm. K.H. confirmed that following the initiation of the traffic stop by CPD, N.T. failed to stop and eventually fled from officers on foot along with W.C.
9. N.T. made the following spontaneous utterances to responding officers:

"I don't want her to get in trouble she didn't know that was under the seat"

"The guns belong to my aunt; we picked them up from Vance the other day and she was afraid to drive them in her car..."

"I have been doing good, and I was going to stop but we had guns in the car, and I panicked so I fled"
10. Responding officers located a Taurus P2111 G2A semi-automatic pistol, bearing serial number ADB929685 on the ground approximately eight to ten feet from N.T.s vehicle. Additionally, the firearm was loaded with one live round in the chamber and 12 additional rounds in the magazine. Officers noted that the firearm was located in such a manner that it was recently placed there, given that it was in a very overt position, noticeable to passersby.
11. While responding officers performed an inventory search of the Toyota, a Taurus G2C 9-millimeter semi-automatic pistol, bearing serial number TC151051, was located under the driver seat. This firearm was loaded with one live round in the chamber and 11 additional rounds in the magazine. Officers located a box to the pistol with serial number TC151051, in the trunk of the Toyota.
12. The Taurus P2111 G2A semi-automatic pistol, bearing serial number ADB929685 with its 13 live rounds, the Taurus G2C 9-millimeter semi-automatic pistol, bearing serial number TC151051 with its twelve live rounds, suspected crack cocaine, additional firearm magazines, slingshot, suspected marijuana and a scale, were all turned into the CPD Property Control Unit (22P015327; 22P015328; 22P015329).
13. On November 3, 2022, CPD officers responded to 1859 Winding Hollow Drive Columbus, Ohio 43231, on the report of a stolen firearm. Upon arrival, officers made contact with Jamie RICHARDS, who stated that on or about August 21, 2022, she went to Vance Outdoors at 3723 Cleveland Avenue and purchased two firearms and then to Vance Outdoors at 4250 Alum Creek Drive to purchase one additional firearm.

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14. RICHARDS explained that she made the purchases as gifts to her juvenile niece C.C., juvenile nephew W.C. and one of their friends named "Nick". RICHARDS explained to officers that she used her own money in conjunction money from C.C. and W.C. to purchase the firearms. RICHARDS told officers that after she bought the first two firearms, C.C. and W.C. told her that she needed to go back and buy a third firearm for their friend "Nick", which she did. RICHARDS claimed after purchase, C.C., W.C. and "Nick" stole the firearms from her. RICHARDS later retracted this statement in front of officers, explaining that she knew she was wrong in purchasing the firearms for the juveniles and now wanted to correct her wrong.
15. RICHARDS was transported to CPD Headquarters Gun Crime Unit to be interviewed by Detective Spencer #2073 for Unlawful Transactions in Firearms. RICHARDS stated that her sister told her that RICHARDS' niece and nephew were pulled over with two of the firearms purchased by RICHARDS. RICHARDS also explained that "Nick" requested she purchase a firearm for him because he had a criminal record. Further, that in purchasing the firearms for her niece and nephew, she was aware they were under the legal age to possess a pistol. RICHARDS indicated to the detective that she knew it was illegal to purchase the firearms for them. RICHARDS was slated at the Franklin County Jail-Jackson Pike on an existing Possession of Drug Abuse Instruments warrant (Case # 7402-22).
16. When purchasing the above-mentioned firearms, investigators noted that RICHARDS indicated she was not drug dependent on her ATF 4473 form, having a recent history with narcotics as follows:
- May 21, 2022, RICHARDS was issued a summons at Whitethorne Avenue and Ong Street for Possession of Drug Abuse Instruments (CPD Case #220359618).
 - May 21, 2022, RICHARDS' husband reported her missing. He explained that she started rehabilitation at Maryhaven-Drug & Alcohol Addiction Treatment Center at the beginning of March. However, she walked out of treatment approximately one month before his reporting (CPD Case #220357242).
 - May 22, 2022, RICHARDS was arrested at Sullivant Avenue and Oakley Avenue for Possessing Drug Abuse Instruments (CPD Case #230359618).
 - August 18, 2022, RICHARDS reported to CPD Detective Mall #2009, that she was in the area of Terrace Avenue and Sullivant Avenue attempting to purchase fentanyl, before she was beat up and sexually assaulted (CPD Case #220524487).
 - On November 3, 2022, RICHARDS was arrested in her home on a warrant for Possession of Drug Instruments (CPD Case #220807873).
 - On November 4, 2022, RICHARDS was convicted on a Possessing Drug Abuse Instruments charge (Ohio Revised Code 2925.12), a misdemeanor of the second degree.

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17. On July 29, 2023, at approximately 2:00PM, ATF Task Force Officer, Heather Collins, conducted a custodial interview with RICHARDS at the Franklin County Jail. TFO Collins read RICHARDS her Constitutional Rights, which RICHARDS signed confirming understanding and agreed to answer questions without an attorney present.
18. RICHARDS explained that she was currently residing with her sister on Townsend Avenue near Sullivant Avenue on the westside of Columbus, Ohio.
19. When asked about her drug addiction, RICHARDS said she “does anything and everything” when it comes to drug type. RICHARDS said that she uses drugs to cope with stressors in her life. RICHARDS stated that she began using drugs after being given fentanyl over a year ago. RICHARDS confirmed having been a client at Maryhaven Drug & Alcohol Addiction Treatment Center and should go back for treatment now.
20. RICHARDS told TFO Collins that she knew her niece C.C. and the boys (W.C. and N.T.) were not old enough to purchase a firearm. Additionally, that the three gave her money for the firearms and showed her online what they wanted prior to going to purchase. RICHARDS described the situation as “very planned out”.
21. RICHARDS went on to explain that N.T. drove, while W.C., C.C. and herself were all passengers in the vehicle.
22. RICHARDS told TFO Collins that she “didn’t do it right” at the first gun store. She explained that she was supposed to buy three guns but only bought one. As a result, the group had to go to another store for purchase of additional firearms.
23. TFO Collins showed RICHARDS the ATF 4473 form and asked if RICHARDS recalled answering questions on the form regarding purchase of the firearm(s) for yourself and not another. RICHARDS explained to TFO Collins that she did recall the question and answered untruthfully on the form. Additionally, when asked about checking the box on the form indicating that she did not use illegal drugs and/or was not addicted to drugs or alcohol, RICHARDS stated her addiction was not as bad at that time.
24. A verbal interstate nexus determination was provided by Bureau of Alcohol, Tobacco, Firearms and Explosive (ATF) Special Agent Cole Benner for the Taurus P2111 G2A semi-automatic pistol, bearing serial number ADB929685 and the Taurus G2C 9-millimeter semi-automatic pistol, bearing serial number TC151051. It was determined that the aforementioned firearms, which were seized on or about September 7, 2022, were manufactured outside of the State of Ohio and, therefore, affected interstate commerce to reach the State of Ohio.
25. The aforementioned offense occurred in Franklin County, Ohio, in the Southern Judicial District of Ohio.

PROBABLE CAUSE AFFIDAVIT

Shawn Lavell MIDDLETON Jr.

26. Based on this information, your affiant believes probable cause exists that Jamie Lynn RICHARDS knowingly made false statement(s) in connection with the purchase of the Taurus P2111 G2A semi-automatic pistol, bearing serial number ADB929685 and the Taurus G2C 9-millimeter semi-automatic pistol, bearing serial number TC151051, in violation of 18 U.S.C. § 922(a)(6) and 924(a)(2).



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Amanda K. Hill
ATF Task Force Officer

Sworn to and subscribed before me this 28th day of March 2025 at 2:33 PM Columbus, Ohio.


UNITED STATES MAGISTRATE JUDGE

